

**Table 1 – Comparison of Redwood City’s Proposed Recycled Water Project to Representative Bay Area Recycled Water Projects**

<b>Parameters</b>	<b>Marin Municipal Water District</b>	<b>South Bay Water Recycling/ City of Santa Clara<sup>1</sup></b>	<b>City of Sunnyvale</b>	<b>City of Palo Alto</b>	<b>SBSA Redwood City First-Step Project</b>
Years in Operation	20	14	15	15	3
Community Population	175,000	1,060,000	132,000	59,000	80,000
Capacity (AF/yr & MGD)	2 MGD 870 AF/yr	10 MGD 6,000 AF/yr	8 MGD 2,170 AF/yr	4 MGD	0.25 MGD 73 AF/yr (3.7 MGD or 1,946 AF/yr proposed)
No. of Existing Customers	318	390	80	3	12 (120 proposed)
<b><u>Uses:</u></b>					
Schoolyard Irrigation	X	X	X		Proposed
Park/Golf Course Irrigation	X	X	X	X	X
Streetscape Irrigation	X	X	X		X
HOA Irrigation	X	X			Proposed
Landscape Impoundments	X	X	X	X	X
Car Washes/Laundries	X				
Industrial Uses & Cooling	X	X	Proposed		Proposed
Internal Plumbing/Toilets	X	X	X		Proposed

<sup>1</sup> The City of Santa Clara began delivering recycled water in 1989 and is now a partner in South Bay Water Recycling.

<b>Table 1 (cont.)</b> <b>Parameters</b>	<b>Marin Municipal Water District</b>	<b>South Bay Water Recycling/ City of Santa Clara<sup>2</sup></b>	<b>City of Sunnyvale</b>	<b>City of Palo Alto</b>	<b>SBSA Redwood City First- Step Project</b>
<b><u>Performance Criteria:</u></b>					
No. of Permit Violations	none	none	none	none	none
No. of Reported Illnesses	none	none	none	none	none
No. of Successful Claims or Lawsuits	none	none	none	none	none
No. of Disconnects	none	none	none	none	none
No. of Landscape Failures	none	none	none	none	none
Initial Public Concerns / Resistance?	yes	yes	yes	yes	yes

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<sup>2</sup> The City of Santa Clara began delivering recycled water in 1989 and is now a partner in South Bay Water Recycling.

## **Safety Record for the City of Redwood City, the SFPUC and the SBSA**

Public confidence in the agencies that directly serve water to a community is vital. While it is broadly understood that multiple State and federal agencies have regulatory authority over water and wastewater services, most citizens consider the integrity and performance of their local service providers when seeking the assurances they desire for protection of public health and safety. Therefore, the following summary information is provided in order to establish that Redwood City has a strong record of safety related to water and wastewater.

### **City of Redwood City Water Utility (municipal, retail water distribution system)**

According to the U.S. EPA Safe Drinking Water Information System (SDWIS):

- In the category of Health Based Violations of federal and state regulations; *“No health-based violations found. EPA has no record of any health-based violations reported by the state for this water system (1993 and later violations are included in this report).”*
- In the categories of Monitoring, Reporting and Other Violations, since 1993, a single non-significant monitoring violation occurred (April 2000).

In an annual Water System Inspection letter to the City of Redwood City dated February 22, 2001, California Department of Health Services District Engineer Eric Lacy, P.E. stated, “The water system is in excellent condition and operated in a professional and competent manner. The storage facilities and pump stations are in good physical condition, clean, and well maintained. The City’s written plans for sampling, emergency operation, valve exercising, and flushing are sufficient and current. The City maintains excellent and quickly accessible records on operations and maintenance, and water quality monitoring.”

### **San Francisco Public Utilities Commission (San Francisco Hetch Hetchy Regional Water System - wholesale)**

According to the U.S. EPA Safe Drinking Water Information System (SDWIS):

- In the category of Health Based Violations of federal and state regulations; *“Amount of contaminant exceeded safety standard (MCL) or water was not treated properly. Treatment Technique (Surface Water Treatment Rule) violations occurred in June 1998, August 1995, March 1995 and June 1993.”*
- In the categories of Monitoring, Reporting and Other Violations, since 1993, two non-significant monitoring violations occurred (August 1996 and Sept. 1993).

Because the SFPUC regional water system is an unfiltered surface water source of potable water, it is prone to occasional excessive turbidity events, usually caused by sudden rain storms or snow melt in the Hetch Hetchy watershed. The violations above reflect such events, which compromised water quality for short durations. The effect of these events on water quality in Redwood City was visibly discernable cloudiness in the water, lasting from 12 to 48 hours. No action was required of Redwood City, other than responding to customer inquiries.

### **South Bayside System Authority**

**Regulatory Compliance:** The overriding objective that determines the focus of SBSA's activities is consistent, long term, reliable compliance with all regulatory requirements. In addition to the traditional emphasis of wastewater agencies on National Pollutant Discharge Elimination System (NPDES) permit compliance, SBSA places equal value on compliance with air quality, employee safety and hazardous materials compliance.

SBSA has a long history of consistent NPDES permit compliance. During the past three years there have been no violations of NPDES permit requirements.

Regulatory compliance is a key consideration in many other SBSA activities. The surface runoff from rainfall and spills is 100% contained on the SBSA site and returned to the plant for treatment. Toxic air emissions are kept below the level considered "not significant" by the Bay Area Air Quality Management District regulations. This level was established by a comprehensive air toxics inventory and risk assessment that evaluated the risk from SBSA emissions on the nearest residential zoned property. The odor control program is based on an objective of keeping the frequency of detectable odors in the nearby residential area to less than one each three years.

A Recycled Water Policy was adopted by the SBSA Commission that establishes SBSA as the technical and institutional leader in the SBSA service area on recycled water, and states that SBSA will provide legislative, regulatory and technical expertise coordinating public and private participation in developing recycled water projects. The First Step Recycled Water project was initiated in 2000 to develop and refine inter-agency relationships with the water purveyor and regulatory agencies, and to establish customer confidence and landscape maintenance strategies for individual use sites. The project has successfully completed its third year with 100% compliance with all regulatory requirements.

**Performance Recognition:** SBSA received the Association of Metropolitan Sewerage Agencies (AMSA) "Gold Award" for 100% permit compliance in year 2001 and 2002. SBSA was selected the California Water Environment Federation Plant-of-the-Year in 1996 and 2001. Only two other treatment plants in the state have been repeat winners of this statewide award.

## Discussion of Specific Issues

This section of the Addendum contains responses to specific issues raised during public discussions on the proposed recycled water project. The discussions are organized as follows: a statement of the issue, its public concern, background information on the issue, findings and conclusions, and references used in the discussion. The author of each discussion is also identified.

### Risk from Pathogens (James Crook, Ph.D., P.E.)

**Statement of the Issue:** Will use of recycled water for landscape irrigation project present a public health risk to the community from microbiological contaminants?

**Public Concern:** Recycled water used for landscape irrigation may contain pathogenic microorganisms that are harmful to humans.

**Background:** The infectious agents that may be present in untreated municipal wastewater can be classified into three broad groups: bacteria; parasites (protozoa and helminths); and viruses. There are several pathways (ingestion, inhalation, contact) through which an individual can acquire disease from recycled water – but only if pathogens are present in sufficient numbers to initiate disease in susceptible individuals. In order to insure public health protection where recycled water is used for landscape irrigation in urban areas, it is important to control pathogenic microorganisms by effective treatment and disinfection.

The California Department of Health Services (DHS) has adopted Water Recycling Criteria<sup>1</sup> to ensure that the use of recycled water for irrigation in urban areas does not impose undue risks to health. The criteria prescribe treatment processes, water quality limits, treatment reliability requirements, and use area controls for several types of recycled water applications, including the irrigation of residential landscaping, parks, playgrounds, and schoolyards. The criteria are based on research, demonstration studies<sup>2,3</sup>, experience at operating recycling plants, attainability, and good engineering practice. They prescribe criteria that are intended to result in recycled water that does not contain measurable levels of pathogens. Although incidental, infrequent ingestion of tertiary treated reclaimed water would not present unreasonable health risks from microbial pathogens or chemicals, the DHS criteria also include use area requirements as an added safety measure to reduce potential ingestion of the recycled water. Measures include: confinement of runoff to the approved recycled water use area unless otherwise approved by the regulatory agency; prohibition of reclaimed water spray, mist, or runoff in dwellings, designated outdoor eating areas or food handling facilities; protection of drinking water fountains against contact with recycled water; signs at sites using recycled water that are accessible to the public; prohibition of hose bibs on recycled water piping systems accessible to the public; and conformance to cross connection regulations. In addition, the California Health and Safety Code requires a color-coded labeling or marking system for pipes and appurtenances that clearly distinguishes recycled water from potable water.

The ability to reliably produce recycled water that is safe for the intended use has been demonstrated throughout California at full-scale facilities having the same treatment

processes, water quality limits, and reliability features as those at the SBSA wastewater treatment plant. For example, during a 10-year study<sup>4</sup> of 6 tertiary treatment plants (similar to the SBSA plant) operated by the County Sanitation Districts of Los Angeles County, only 1 of 590 samples of recycled water was found to contain a measurable level of enteric viruses, while a 1997-1999 study<sup>5</sup> at the Salinas Valley Reclamation Project did not detect any *E. coli* 0157:H7, *Cyclospora*, *Salmonella*, helminth ova, viable *Giardia*, or culturable natural (*in situ*) viruses. Only an extremely low number of *Cryptosporidium* (in only two instances) was detected in any of the tertiary treated reclaimed water samples, and it was not determined whether the oocysts were viable or nonviable.

Risk assessment models have been used to estimate human health risk associated with various applications of recycled water. For example, one study<sup>6</sup> directed at golf course irrigation using tertiary effluent (similar to that from the SBSA plant) indicated that the annual risk of contracting at least one infection from exposure to the water was less than that considered acceptable for drinking water. Maximum contaminant levels for drinking water are typically based on a one in ten thousand ( $1 \times 10^{-4}$ ) acceptable risk level. A similar study<sup>7</sup>, which took treatment reliability into account, determined that the annual risk of enteric virus infection of using tertiary recycled water for golf course irrigation ranged from 1.4 in one million to 5.5 in ten million episodes ( $1.4 \times 10^{-6}$  to  $5.5 \times 10^{-7}$ ) assuming a 95% confidence level. The apparent risk level from virus infection is approximately 100 to 1,000 times safer than the California health based standards. Another study<sup>8</sup> conducted at the Irvine Ranch Water District (again, a treatment facility with the same treatment and quality requirements as those at SBSA) using an epidemiologically based risk assessment model, determined that swimming in an impoundment filled recycled water did not increase the predicted incidence levels above those obtained when the impoundment was filled with water of non-sewage origin.

Exposure to recycled water in spray form (aerosols) has often been cited as a public health concern. A review of the scientific literature does not indicate that there have been any reported documented disease outbreaks in the U.S. resulting from spray irrigation with disinfected recycled water, including recycled water that has received considerably less disinfection than that provided at the SBSA facility.

There are urban irrigation projects in several states (e.g., Arizona, Florida, and Texas) that have less restrictive treatment and disinfection criteria than those imposed on projects in California, and the literature reviewed did not reveal any documented instances of illness resulting from recycled water in these or other states. This is particularly significant in Florida's case, since Florida has had large-scale dual water systems providing recycled water for irrigation throughout communities since the mid-1970s. St. Petersburg, for example, has been using recycled water for multiple uses within the city since 1977 and currently has more than 10,000 individual residential customers where recycled water is used for lawn irrigation. The Irvine Ranch Water District (IRWD) is one example of a large dual water system in California. IRWD has been in operation since 1977 and currently uses about 15 million gallons per day of recycled water for several applications, including landscape irrigation of residential lawns, parks, and schoolyards. The County Sanitation Districts of Los Angeles County (which has the same recycled water treatment and quality

requirements as SBSA) also provides large amounts of recycled water for landscape irrigation. The final draft of a report by the California Department of Water Resources Recycled Water Task Force states that, in 2000, approximately 80,000 acre-feet (70 million gallons/day) of recycled water was used for landscape irrigation in the state.

A correlation can be made between EPA's recommended microbial standard of 126 *E. coli*/100 mL for recreational waters<sup>9</sup> (swimming allowed with some ingestion anticipated) and recycled water. EPA's standard is much less restrictive than the total coliform standard of 2.2/100 mL required by DHS for irrigation with recycled water in urban areas and met in the SBSA recycled water (*E. coli* is a subset of the total coliform group). Even though there will be no body contact activities associated with the use of recycled water in Redwood City and only incidental contact with the water, the microbial quality of the recycled water clearly is superior to the quality recommended by EPA for recreational waters.

**Findings:** Pathogens are present in untreated municipal wastewater but can be reduced to immeasurable levels by conventional wastewater treatment processes. There have been no documented cases of illness in California (or elsewhere in the U.S.) resulting from the use of recycled water to irrigate urban areas. The SBSA wastewater treatment plant conforms to all of the regulations contained in the California DHS *Water Recycling Criteria*, which are conservative from a public health standpoint.

**Conclusion:** Existing data indicate that the use of recycled water from the SBSA wastewater treatment plant for landscape irrigation in urban areas will be safe from infection or disease associated with pathogenic microorganisms.

#### References:

1. State of California. 2000. *Water Recycling Criteria*. Title 22, Division 4, Chapter 3, California Code of Regulations. California Department of Health Services, Drinking Water Program, Sacramento, California.
2. Sanitation Districts of Los Angeles County. 1977. *Pomona Virus Study: Final Report*. California State Water Resources Control Board, Sacramento, California.
3. Engineering-Science. 1987. *Monterey Wastewater Reclamation Study for Agriculture: Final Report*. Prepared for the Monterey Regional Water Pollution Control Agency by Engineering-Science, Berkeley, California.
4. Yanko, W.A. 1993. Analysis of 10 Years of Virus Monitoring Data from Los Angeles County Treatment Plants Meeting California Wastewater Reclamation Criteria. *Water Environ. Research*, 65(3):221-226.
5. Jaques, R.S., G.M. Antonz, R.C. Cooper, and B Sheikh. 1999. Pathogen Removal Effectiveness of a Full-Scale Recycling Plant. In: *Proceedings of WEFTEC '99*, October 9-13, 1999, New Orleans, Louisiana.
6. Asano, T., Y.C. Leong, M.G. Rigby, and R.H. Sakaji. 1992. Evaluation of the California Wastewater Reclamation Criteria using Enteric Virus Monitoring Data. *Wat. Sci. Tech.*, 26(7/8):1513-1524.

7. Tanaka, H., T. Asano, E.D. Schroeder, and G. Tchobanoglous. 1993. Estimating the Reliability of Wastewater Reclamation and Reuse Using Enteric Virus Monitoring Data. In: *Proceedings of the 66th WEF Annual Conference and Exposition*, pp. 105-118, October 3-7, 1993, Anaheim, California. Published by the Water Environment Federation, Alexandria, Virginia.
8. EOA, Inc. 1995. *Microbial Risk Assessment for Reclaimed Water*. Report prepared for Irvine Ranch Water District by EOA, Inc., Oakland, California.
9. U.S. Environmental Protection Agency. 1986. *Ambient Water Quality Criteria for Bacteria* - 1986. EPA A440/584-002, U.S. Environmental Protection Agency, Office of Water Regulations and Standards, Washington, D.C.



## Pharmaceuticals and Endocrine Disruptors (James Crook, PhD, P.E.)

**Statement of the Issue:** Do pharmaceuticals and endocrine disruptors present a health risk if recycled water is used for landscape irrigation?

**Public Concern:** Recycled water used for landscape irrigation may contain pharmaceutically active compounds and endocrine disruptors that could be harmful to humans.

**Background:** There has been a great deal of interest and, in some cases, concern, regarding human health effects associated with pharmaceuticals, hormones, and other organic wastewater contaminants. Chemicals that interfere with endocrine systems of humans and wildlife are termed endocrine disruptors (EDCs). Chemicals and pharmaceuticals in general that elicit a pharmaceutical response in humans are termed pharmaceutical active compounds (PhaCs). It should be noted that EDCs and PhaCs are not mutually exclusive classifications, as some, but not all, EDCs are also PhaCs. Endocrines are chemicals used by organisms to regulate important metabolic activities, such as ion balance, reproduction, basal metabolism and fight or flight responses, through changes in hormones secreted by the thyroid, parathyroid, pituitary, adrenal, sex, and other glands. Research has identified more than 60 pharmaceutically active compounds that impact the endocrine system of animals or humans in nanogram/liter (ng/L), i.e., one part per trillion, or lower concentrations in the ecosystem. In addition, pharmaceuticals and personal care products are sometimes called PPCPs, which comprise a very broad, diverse collection of thousands of chemical substances, including prescription and over-the-counter drugs, fragrances, cosmetics, sun screen agents, diagnostic agents, biopharmaceuticals, and many other compounds.

Most of the research to date has been directed at the presence, concentration, and effects of pharmaceuticals, personal care products, and endocrine disruptors – or their metabolites – on the aquatic environment, where these constituents have been shown to have adverse effects on aquatic animals such as frogs and fish. Less is known about the presence, concentration, and human health effects (including additive/synergistic effects) associated with these compounds resulting from long-term ingestion from potable waters and concerns have been raised.

Much of the current concern is based on the results of a nationwide reconnaissance of the occurrence of organic contaminants conducted by the U.S. Geological Survey in 1999-2000<sup>1</sup>. Samples collected from 139 streams in 30 states for 95 pharmaceuticals, personal care products, and known or potential endocrine disruptors found that 80% of the streams sampled contained at least one of the chemicals. While measured concentrations were generally low and rarely exceeded drinking water guidelines, drinking water advisories, or aquatic life criteria, many of the compounds do not have such guidelines established<sup>1</sup>.

Many commonly used pharmaceuticals in the United States are ubiquitous in wastewater effluents. In conventional wastewater treatment plants, they can be removed, or reduced in concentration, by microbial degradation, adsorption to particulates that are removed during

wastewater treatment, or by biotransformation. Research on wastewater samples collected at several wastewater treatment plants in California indicated that secondary effluent contains estrogenic hormone concentrations comparable to those that cause vitellogenesis (i.e., feminization) in fish and that filtration of secondary effluent (i.e., tertiary treatment) removes approximately 70% of the hormones from secondary effluent<sup>2</sup>. For example, the synthetic oral contraceptive 17 $\alpha$ -ethynyl estradiol occurs generally at concentrations less than 7 ng/L in wastewater effluent. This compound is suspected, in combination with the steroidal estrogens 17 $\beta$ -estradiol and estrone, of causing vitellogenin production (feminization) in male fish. While conventional secondary and tertiary treatment efficiently removes some pharmaceuticals, removal or reduction of others is highly variable<sup>4,5</sup>.

The release of pharmaceuticals and endocrine disruptors through municipal wastewater into the environment is potentially associated with a human health risk where water is subsequently used to augment a drinking water supply. It should be remembered that recycled water used for urban irrigation is not intended to be consumed; thus, the concerns associated with ingestion of water containing these contaminants do not apply to the Redwood City project. A review of the scientific literature does not provide any information indicating that pharmaceuticals and endocrine disruptors become concentrated on vegetation or in soil via irrigation with recycled water. Drugs detected in the environment are generally in the  $\mu\text{g/L}$  -  $\text{ng/L}$  (parts per billion - parts per trillion) range and many have short half-lives (i.e., they do not persist for long periods in the environment) and may not pose much acute risk<sup>3</sup>. Also, most pharmaceuticals and endocrine disruptors have low volatility or are nonvolatile and, thus, would not be expected to present a health concern from inhalation at spray irrigation sites.

**Findings:** Pharmaceuticals and endocrine disruptors in water have been shown to have adverse effects on aquatic animals. Human health effects associated with long term ingestion of these types of compounds – at the low concentrations potentially present in drinking water – have not been documented and are uncertain at this time. Contact with – or infrequent/inadvertent ingestion of – tertiary treated recycled water containing low levels of pharmaceuticals and endocrine disruptors would appear to present substantially less risk than that associated with long term ingestion of drinking water containing similar levels of such substances.

**Conclusion:** There are no data indicating that the use of recycled water from the SBSA wastewater treatment plant for landscape irrigation in urban areas presents a health risk from pharmaceuticals or endocrine disruptors.

#### References:

1. Kolpin, D.W., E.T. Furlong, M.T. Meyer, E.M. Thurman, S.D. Zaugg, L.B. Barber, and H.T. Buxton. 2002. Pharmaceuticals, Hormones, and Other Organic Wastewater Contaminants in U.S. Streams, 1999-2000: A National Reconnaissance. *Environ, Sci. Technol.*: 36(6)1202-1211.
2. Huang, C., and D.L. Sedlak. 2001. *Environ, Toxic. & Chem.*: 20(1), 133-139.

3. Daughton, C.G., and T.A. Ternes. 1999. Pharmaceuticals and Personal Care Products in the Environment: Agents of Subtle Change? *Environ. Health Perspectives*: 107(6), 907-938.
4. Buser, H.R., T. Poiger, and M.D. Muller. 1999. Occurrence and Environmental Behavior of the Chiral Pharmaceutical Drug Ibuprofen in Surface Waters and in Wastewater. *Environ. Sci. Technol.*, 33:2529-2535.
5. Ternes, T.A. 1998. Occurrence of Drugs in German Sewage Treatment Plants and Rivers. *Water Research*, 32(11):3245-3260.

## Carcinogenic Compounds (James Crook, Ph.D., P.E.)

**Statement of the Issue:** Do carcinogenic compounds present a health risk if recycled water is used for landscape irrigation in an urban area?

**Public Concern:** Recycled water used for landscape irrigation may contain carcinogenic compounds that are harmful to humans.

**Background:** Since chlorine is used for disinfection at the SBSA wastewater treatment plant for disinfection, there is the possibility that chlorine will react with organic and inorganic constituents in the water to create disinfection byproducts (DBPs) that are potentially harmful upon ingestion of the water. The DBPs of concern in drinking water include trihalomethanes, haloacetic acids, bromate, and haloacetonitriles. Data from various studies indicate that tertiary treatment of municipal wastewater (similar to that in place at SBSA) removes or reduces many of the compounds that react with chlorine to form DBPs and, thus, reduces the potential for DBP formation. DBP levels – as well as pesticide and heavy metal levels – in tertiary treated wastewater generally are below maximum contaminant levels (MCLs) in drinking water standards<sup>1</sup>. A review of the scientific literature provided no information on accumulation of DBPs on turf or soil, but many DBPs are volatile and would not be expected to accumulate on turf or in soil. While it is true that some DBPs remain unidentified and poorly characterized toxicologically, it should be noted that: (1) risk levels for contaminants in drinking water are based on consumption of 2 liters/day (0.5 gallons/day) of water by a 70-kilogram (150-pound) person for 70 years; and (2) recycled water in Redwood City will be used only for nonpotable applications.

N-Nitrosodimethylamine (NDMA) is an example of a probable carcinogen that has been identified in both recycled water and drinking water. In the past, NDMA was a key ingredient in the production of 1,1-dimethylhydrazine, a component of rocket fuel. It has also been used in battery, rubber, and polymer manufacturing, and as an additive to some lubricants. It is no longer produced commercially. NDMA is semi-volatile and has a high chronic and acute toxicity; levels needed to cause acute toxicity are much higher than those that have found in tertiary treated recycled water. It is classified by EPA as a probable human carcinogen with a one in a million ( $1 \times 10^{-6}$ ) lifetime cancer risk at 0.7 nanograms per liter (ng/L), i.e., 0.7 parts per trillion. This level is based on elicited *in vitro* genotoxicity and carcinogenicity effects in laboratory animals conducted over the past two decades. EPA has not adopted a primary drinking water standard for NDMA. The California DHS has set an action level of 10 ng/L in drinking water. Action Levels are health based advisory levels established by the California Department of Health Services for chemicals that lack maximum contaminant levels.

Several water supply agencies in California have observed the formation of NDMA after chlorine disinfection of source water<sup>2</sup>. While chlorination of surface waters used for drinking typically results in the formation of less than 10 ng/L NDMA, concentrations in tertiary treated wastewater can be much greater. The observation of NDMA is due to improvements in analytical techniques that have enabled detection of concentrations as low as 1 ng/L rather than changes in treatment techniques. In order to put the concentration

and health risk of NDMA in water in perspective, it should be noted that NDMA is common in food products such as fish, cheese, milk, cured meats, and beer. Average concentrations of NDMA measured in food have been shown to range from 90-100 ng/L for whole milk, 2,600-2,700 ng/L for bacon, and 50-7,700 ng/L for various beers<sup>3</sup>. It can also be found in tobacco smoke, cosmetics, and rubber products.

**Findings:** Several disinfection byproducts, such as the trihalomethanes, and other chemical contaminants are known to be carcinogenic upon long-term ingestion; however, a review of the literature provides no indication that they have been implicated as having any adverse effects resulting from nonpotable uses of recycled water, such as landscape irrigation. Most of these contaminants are present in tertiary treated wastewater at levels that are lower than maximum contaminant levels specified in drinking water standards. Fears of chronic health effects (associated with long term ingestion of water containing DBPs or other carcinogens) are unfounded for recycled water projects directed at nonpotable applications of the water, since there will be no long term ingestion of the recycled water.

**Conclusion:** There are no data indicating that the use of recycled water from the SBSA wastewater treatment plant for landscape irrigation in urban areas will present a health risk to humans from DBPs or other carcinogens.

#### References:

1. National Research Council. 1998. *Issues in Potable Reuse: The Viability of Augmenting Drinking Water Supplies with Reclaimed Water*. National Academy Press, Washington, D.C.
2. Siddiqui, M., and K. Z. Atasi. 2001. N-Nitrosodimethylamine (NDMA): A DPB and Its Occurrence in Wastewater. In: *Proceedings of the Water Environment Federation 74<sup>th</sup> Annual Conference & Exposition*, October 13-17, 2002, Atlanta, Georgia.
3. Metropolitan Water District of Southern California. 2000. *Report on N-Nitrosodimethylamine (NDMA) in Metropolitan's Treated Water*. May 30, 2000, Water Systems Operations, Metropolitan Water District of Southern California, Los Angeles, California.

## Exposure to Children (James Crook, Ph.D., P.E.)

**Statement of the Issue:** Does the use of recycled water used for landscape irrigation present risks to children?

**Public Concern:** Recycled water used for landscape irrigation may contain microbial pathogens or chemical contaminants that are harmful to children.

**Background:** The issue discussions above conclude that landscape irrigation in Redwood City using recycled water from the SBSA wastewater treatment plant will not present health risks measurably different than those resulting from the use of potable water. These conclusions apply to all residents that live within or close to the proposed irrigation sites, including children. Recognizing that children may have more intimate contact with grounds irrigated with the recycled water, a further discussion documenting their safety is provided.

Children playing in turf irrigated with recycled water could come in contact with pathogenic organisms (if present in the water) or chemical contaminants by: ingestion of grass or soil; contact with turf, soil, or objects wet with recycled water or containing residue from recycled water; by inhalation of recycled water aerosols during spray irrigation; or by contact or ingestion of the recycled water directly from puddles, hose bibbs or other means. As stated in the preceding issue papers, pharmaceuticals and disinfection byproducts would not be expected to accumulate to levels on turf or in soil to levels that present health risks.

Additional safety measures will be imposed on the recycled water distribution system by Redwood City, including: color-coding all recycled pipes, valves, and appurtenances; prohibition of hose bibs or above ground distribution piping systems to reduce the chance of misuse; prohibition of ponding and runoff of the recycled water; irrigation during off-hours to limit potential contact with the water; and inspection and surveillance activities.

The authors of the California DHS *Water Recycling Criteria* recognized during development of the criteria that the mechanisms for contact, ingestion, or inhalation described above can occur. They thus adopted criteria requiring a high degree of treatment and reliability to assure that recycled water used for landscape irrigation in urban areas is free of measurable levels of pathogenic microorganisms. California's water recycling criteria are among the most conservative in the U.S., and the SBSA facility is subject to those restrictive criteria. The literature reviewed did not reveal any documented instances of disease resulting from any of the many landscape irrigation projects in California or elsewhere in the U.S., where there are hundreds of sites using recycled water for the irrigation of parks, playgrounds, school yards, and residential lawns.

As stated in the preceding issue papers, the recycled water produced at the SBSA facility will meet most of the drinking water standards. Drinking water standards for most regulated contaminants are based on long-term ingestion, i.e., 2 liters/day (0.5 gallons/day) for 70 years by a 70-kilogram (150-pound) person. Therefore, infrequent incidental ingestion

of contaminants that may be present in the recycled water would not be expected to present acute or long term adverse health consequences at the concentrations likely to be present.

**Findings:** The recycled water from the SBSA wastewater treatment plant is subject to strict criteria to insure that it will not contain measurable levels of pathogenic microorganisms. Data from the SBSA facility indicate that all requirements are consistently met. Children's activities that may result in contact with the recycled water are expected and the water quality criteria to be met take this into account. A review of the scientific literature did not provide any documentation of illness or disease to children (or adults) resulting from any recycled water landscape irrigation project in the U.S.

**Conclusion:** The use of recycled water from the SBSA wastewater treatment plant for landscape irrigation in urban areas will not present health risks to children that are measurably different than any risks associated with irrigation using potable water.

## Safety of Recycled Water for Irrigation of Landscaping (Bahman Sheikh, Ph.D., P.E.)

**Statement of the Issue:** Is disinfected tertiary recycled water safe for irrigation of residential landscaping, parks, playgrounds and/or schoolyards?

**Public Concern:** Recycled water used for landscape irrigation could be harmful to humans if skin contact or ingestion occurs.

**Background:** The issue summarized above can be answered using at least four different approaches:

- **Public health approach** based on treatment technology, disinfection capability, and the documentation available to the public on hundreds of similar treatment systems currently in operation.
- **Exemplary approach**, based on the numerous other residential areas in California, Florida and other localities using similar quality recycled water over a long period of time.
- **Environmental contextual approach**, acknowledging the numerous sources of contamination of the landscape (domestic and wild animals, fertilizers, pesticides, herbicides, human activity) in contrast to the thoroughly disinfected recycled water supplied in closed pipes for irrigation.
- **Comparative approach**, reasoning that use of recycled water for landscape irrigation is on a lesser level of human exposure than its use for vegetable crop irrigation, where the vegetables are marketed for use in salads and other produce intended for raw and fresh consumption by humans – irrespective of their age, health, or immunity status.

In this discussion, the latter approach is adopted, focusing specifically on the experience gained over the last five years in Monterey County with use of disinfected tertiary recycled water for irrigation of raw-eaten food crops, such as lettuce, strawberries, celery, cauliflower, broccoli, etc. The recycled water used in Monterey County for irrigation of fresh-eaten vegetable crops is disinfected tertiary reclaimed water, with the same quality characteristics as the recycled water currently produced by SBSA serving the City of Redwood City's First Step pilot project.

Other farming areas using similar quality recycled water for irrigation of fresh vegetables are located in Sonoma County and in Orange County.

### Motivation, History and Pilot Project

The Monterey Regional Water Pollution Control Agency (MRWPCA) was formed in the early 1970s as a joint-powers agreement among eight cities<sup>3</sup>, Monterey County, and Fort Ord, to provide wastewater treatment, water reclamation, and effluent disposal for the

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<sup>3</sup> Cities represented in the MRWPCA are: Salinas, Pacific Grove, Monterey, Castroville, Moss Landing, Del Rey Oaks, Seaside, and Marina. Another member, Fort Ord has since been converted from military to civilian use, under the control of the California State University system.



entire Northern Monterey region. The U.S. EPA planning and construction grants that resulted in the regional wastewater management scheme included a strong provision<sup>4</sup> for reclamation and reuse of the effluent for agricultural irrigation. This was motivated by the relatively rapid rate of advance of seawater intrusion into the two confined aquifers supplying fresh water for domestic and agricultural needs in Northern Monterey County.

Seawater intrusion is a coastal phenomenon, caused by overdraft of the aquifers resulting in a hydraulic reversal of flow and movement of saline water inland deteriorating water quality in near-shore wells. An eleven-year pilot project was conducted to determine and demonstrate the safety of using disinfected tertiary recycled water for irrigation of such raw-eaten vegetable crops as celery, lettuce, broccoli, cauliflower, and artichokes. The research team that planned and conducted the pilot project included scientists in the fields of agronomy, biology, public health engineering, sanitary engineering, and survey research<sup>5</sup>.

The research plan was discussed at length by local farmers, Monterey County Environmental Health Officer, Monterey County Farm Advisor, and other stakeholders who formed an oversight task force for the duration of the study. The task force reviewed project plans and made a large number of changes and additions to the research plan in order to make the results as credible and useful to the community as possible. The demonstration project was successfully concluded in 1987, conclusively demonstrating the safety of use of recycled water for irrigation of food crops. These results and conclusions were published in a comprehensive final report, in peer reviewed journals, and in numerous technical publications as well as presentations at national and international conferences. Some of these publications are included among the list of references at the end of this paper.

### **Overview - Project Implementation**

The Monterey County Water Recycling Projects comprise a partnership between the Monterey County Water Resources Agency (MCWRA) and the MRWPCA. The partnership was formed in 1992, resulting in a \$75-million project, including tertiary treatment facilities, a 45-mile pressurized distribution system, and 22 supplemental wells. The purpose of the projects is to supply irrigation water to about 12,000 acres of farmland in the northern part of Salinas Valley. The project began full-scale operation in 1998 and currently provides about 13,000 acre-ft per year of recycled water, with a peak production rate of almost 30 million gallons per day. The project is designed for ultimate capacity of 20,000 acre-ft per year with future provisions for storage of a portion of the winter flows for summer use. Crops grown currently include strawberries, lettuce, broccoli, celery, cauliflower, and artichokes.

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<sup>4</sup> These provisions arose from regional planning for long-term wastewater management in the basin, and were a result of recognition of the water shortage conditions in the region and the resultant over-pumping of the local coastal aquifers for domestic and agricultural uses. Reuse of reclaimed water was made a grant condition for the construction of the Regional Treatment Plant by the State Water Resources Control Board—as long as reuse was shown to be viable and economically feasible. Community involvement in the planning process was the key to the ultimate viability and feasibility of the water reuse plans.

<sup>5</sup> Key members of the research team included Dr. Bahman Sheikh (agronomist/soil scientist, project manager, and author of this paper), Professor Robert C. Cooper (public health scientist—now, Emeritus, UC Berkeley), and Dr. Robin Cort (biologist, environmental scientist, with Parsons Engineering Science).

### **Public and Customer Perception**

Initially, the majority of the farming public was skeptical, with a few vocal and active opponents. However, the pilot project, known as Monterey Wastewater Reclamation Study for Agriculture (MWRSA) underwent significant efforts to educate them that recycled water meeting California's strict Title-22 regulations would be safe and wholesome for use in irrigation of food crops and for long-term productivity of their soils. Potential impact of use of recycled water on sale of the crops to the public was a more complicated concern to address. A market analysis, focusing on major wholesale buyers in large metropolitan areas in the United States (New York, Chicago, Los Angeles, San Francisco), discovered that the market was not affected by the type of irrigation water used, as long as the irrigation water met regulatory requirements and as long as no labeling of the produce was required. It was established that both of these conditions were met. Over the past five years, since the project has been fully operational, there have not been any negative impacts on the sale of crops to the wholesale or retail market. Neither has there been a need for labeling the produce as having been irrigated with recycled water<sup>6</sup>. Public health agencies agreed to waive the labeling requirements around the farms using recycled water, as long as access to private property was restricted with appropriate signs. This was deemed necessary to avoid giving the public the incorrect impression that use of the recycled water for irrigation of food crops was in any way unsafe.

The agencies involved have a detailed emergency plan ready for implementation in case there are reports that implicate the recycled water in any crop contamination cases that might arise in the future—either as a rumor, intentional misinformation, or an unrelated actual contamination. The plan has not yet been needed to be implemented—after five years of using recycled water. However, it is continually updated and kept in readiness mode, in large part to ensure the farmers that their investments will be protected.

Professor William Bruvold conducted extensive survey research throughout California in the 1970s to determine the level of public acceptance of various uses of recycled water. He found an inverse correlation between acceptance and the level of intimacy of use of reclaimed water. For example, use for drinking was least acceptable (44 percent) and irrigation of landscapes, including golf courses, most acceptable (98 percent). Irrigation of vegetables was acceptable to 88 percent of the respondents<sup>7</sup>. These early findings have since been confirmed by numerous recent surveys conducted in different parts of the country, including one in the City of San Francisco<sup>8</sup>. The percentage of San Franciscans surveyed who “strongly supported” or “moderately supported” using recycled water for watering yards in residential neighborhoods was 85 %.

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<sup>6</sup> Labeling of a product is required when a potential or actual health or safety hazard is proven; for example, sugar, fat, salt, nicotine, etc., are known to pose significant health risk to humans when consumed in food or tobacco products, hence the regulatory requirement for labeling of those products. No potential or actual public health risks have been proven with use of recycled water for any of its allowed applications; therefore, there has never been a regulatory requirement for labeling any agricultural product irrigated with recycled water.

<sup>7</sup> Bruvold, W. H., “Public Attitudes toward Reuse of Reclaimed Water”, *contrib. Univ. Calif. Water Resource. Cent.* 173, 1972.

<sup>8</sup> Public Affairs Management; and Public Research Institute, San Francisco State University, “Assessing Public Opinion Regarding the Recycling of San Francisco's Treated Wastewater: A Survey of San Francisco Neighborhoods”, August 1995.

The agencies involved in implementing the Monterey County Water Recycling Projects have prepared a number of public information materials and strategies to avert the possibility of rumors and unfounded fears from causing economic harm to the growers. These preparations include:

- Project educational brochures
- Worker safety video and brochure
- Produce seller training
- Updated marketing study
- Briefing State regulatory officials
- Briefing produce trade organizations
- Utilizing world-class experts as advisors on pathogens, soil science.
- User booklet
- Reference book
- Emergency response plan

### **Ensuring and Documenting Food Safety**

From the beginning, food safety has been a primary concern of the MRWPCA and its partners in the water recycling project. In the early planning stages, a five-year pilot project was conducted in which the same crops were grown in rotation in 96 replicated randomized plots, some irrigated with recycled water and some with well water. At each harvest, samples were taken from the crops, soils, irrigation waters, and runoff water and analyzed for microbiological and chemical parameters<sup>9</sup>. Statistical tests were performed on the results to determine if any differences might be attributed to use of recycled water. Over the five year period, no such differences were observed and none of the monthly samplings of recycled water over the five-year period was positive for virus.

Prior to start of large-scale use of recycled water, additional food safety tests were conducted to determine the ability of the treatment process to inactivate pathogenic organisms such as *E. Coli* 0157:H7, *Cyclospora*, *Giardia*, *Cryptosporidium*, *Salmonella*, and *Shigella*. The results clearly indicated that the recycled water was as safe as any other source of irrigation water – if not safer than some<sup>10</sup>.

Over the last five-year period of full-scale irrigation on 12,000 acres of vegetable crops with recycled water, samplings of recycled water for pathogenic microorganisms were continued, even though they were not required by the regulatory agencies – in this case, the Regional Water Quality Control Board and the Monterey County Environmental Health Department. This was done to further verify the continued safety of recycled water, and to give

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<sup>9</sup> Constituents and parameters tested on water, crops, and/or soil samples included the following: coliform (including fecal) bacteria, virus, parasites, pH, electrical conductivity, calcium, magnesium, sodium, potassium, carbonate as CaCO<sub>3</sub>, bicarbonate as CaCO<sub>3</sub>, hardness as CaCO<sub>3</sub>, nitrate as N, ammonia as N, total phosphorus, chloride, sulfate, boron, total dissolved solids, biochemical oxygen demand (BOD), adjusted SAR, MBAS, cadmium, zinc, iron, manganese, copper, nickel, cobalt, chromium, lead, crop yield, shelf life, and a number of crop quality characteristics.

<sup>10</sup> Surface water sources commonly used for irrigation are routinely contaminated with animal droppings and runoff from adjacent areas. Tertiary recycled water, by contrast, is treated, disinfected, and delivered in closed pipes. Safety of recycled water, by now, has been corroborated by intensive studies in other areas, and by the track record of some 250 agencies producing and reusing similar disinfected tertiary recycled water.

additional confidence to the growers that they were receiving a reliably safe source of water. The results continue to corroborate earlier conclusions reached during the pilot study and during the run-up to full-scale irrigation with recycled water.

In addition to these intensive tests for food safety, the Monterey County Environmental Health Department has taken regular samples of recycled water for analysis in their own laboratories. The results of these independent tests have consistently corroborated those performed by the Agency and its contractors.

Over the past five years, thousands of tons of vegetables have been harvested from the 12,000 acres irrigated with disinfected tertiary recycled water and sold on the open market throughout the country. Wholesale buyers and markets are aware of the source of water used for irrigation of these crops, and as long as food safety is assured by the regulatory agencies, they have no qualms about buying and marketing the produce. Some of the produce they buy and market comes from foreign countries where the sources of irrigation water are of far lesser (and far less regulated and monitored) quality.

Even though a mandatory use ordinance is in effect in the service area, it has not been necessary to invoke the mandate. Within the 12,000 acres irrigated with recycled water, 95 percent of the growers voluntarily use recycled water for irrigation.

#### **Water Quality Assurance**

An enhanced water quality assurance program has been initiated with the following components:

- Source Control
- In-Plant Monitoring
- Equipment Redundancy
- Water Storage Monitoring
- Distribution System Monitoring
- Worker Safety Program
- Product Safety Testing
- Water Quality Advisory Committee

**Findings:** Over the five-year operational phase of the Monterey County Water Recycling Projects, there have been no reports of any public health problems connected with the use of recycled water for irrigation of vegetable crops. The state and local public health officials have been involved in monitoring the system. In addition, the Monterey County Environmental Health Department has performed independent tests of water quality for the presence of indicator microorganisms. The results have verified the monitoring results obtained by MRWPCA. Personnel from the Monterey County Environmental Health Department recently participated in a tour of the project with a group of out-of-state visitors and responded to the visitors' questions with positive reports about the safety of recycled water used for irrigation.

**Conclusion:** The following conclusions are based on the operational record of the Monterey Water Recycling Projects, ongoing monitoring studies, and its predecessor five-year field pilot and demonstration project:

1. Disinfected tertiary recycled water is safe. The water is virtually pathogen-free and safe for direct contact with humans, such as in breathing sprinkler aerosols.
2. Use of recycled water for irrigation of raw-eaten food crops is safe for consumers of raw-eaten food crops thus irrigated.
3. Since use of recycled water for food crop irrigation is demonstrably safe, its use for the less-intimate uses, such as landscape irrigation, is by comparison deemed equally safe.
4. Public and consumer acceptance of food grown with recycled water has not been an issue. Food safety has been scientifically documented and therefore labeling has not been required.
5. Posting of sites with warning signs sends a mixed message to the general public. Posting is required by existing regulations to prevent unauthorized use of recycled water for drinking<sup>11</sup>. Flexibility in the design, wording, and color scheme of signs is feasible and can result in greater public acceptance.

#### References:

1. DHS, 2001. "California Health Laws Related to Recycled Water: Title 22, Chapter 3 Water Recycling Criteria" California Code of Regulations. Available at the California DHS website as "The Purple Book", in .PDF format: <http://www.dhs.ca.gov>
2. Garcia, A., Walker, A., Yanko, W. 1999. "Removal and Fate of Giardia Cysts in Water Reclamation Plants", *Proceedings of the 72<sup>nd</sup> Annual Water Environment Federation Technical Exposition and Conference* [CD-ROM], New Orleans, Louisiana, Oct 10-13; Water Environment Federation, Alexandria, Virginia.
3. Garcia, April, William Yanko, Glenda Batzer, Giovanni Widmer 2002. "Giardia Cysts in Tertiary-Treated Wastewater Effluents: Are They Infective?" *Water Environment Research*, 74 (6): 541-544.
4. Monterey County Health Department, 2000, "Annual Tertiary Monitoring Report for 2000", unpublished internal report, available from the Department upon request.
5. Monterey County Health Department, 1999, "Annual Tertiary Monitoring Report 1999", unpublished internal report, available from the Department upon request.
6. Sheikh, B., Nelson, K., Cooper, R. C., Holden, R., Israel, K., 2003. "Efficacy of Pathogen Removal at Full-Scale, Operational Water Reuse Facilities in Monterey, California", Scheduled for presentation at WateReuse Symposium XVIII, San Antonio, Texas.

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<sup>11</sup> This requirement is intended to add an additional layer of conservatism to the safe use of recycled water, even though a number of accidental and intentional illegal cross-connections (and the resultant unwary consumption of recycled water) have not been traced to any documented negative outcomes.

7. Sheikh, B., Cooper, R.C. Israel, K. E. 1999. "Hygienic Evaluation of Reclaimed Water Used to Irrigate Food Crops – A Case Study", *Water Science and Technology*, 40(4-5):261-267.
8. Sheikh, B., Cort, R. P., Kirkpatrick, W. R., Jaques, R.S., Asano, T. 1990. "Monterey Wastewater Reclamation Study for Agriculture." *Research Journal WPCF*, 26(3): 216-226.
9. Walker-Coleman, L., York, D. W., Menendez, P. 2002. "Protozoan Pathogen Monitoring Results For Florida's Reuse Systems", *Proceedings, WaterReuse Symposium XVII*, September 8-11, 2002, p. 2, Orlando, Florida
10. Yanko, William A., *Analysis of 10 Years of Virus Monitoring Data from Los Angeles County Treatment Plants Meeting California Wastewater Reclamation Criteria*, *Water Environment Research*, Vol. 65, No. 3, May/June 1993, pp. 221-226
11. York, David W., "Protozoan Pathogens: A Comparison of Reclaimed Water and Other Irrigation Waters", in *Conference Proceedings of Water Reuse '98*, Joint AWWA-WEF sponsored conference in Orlando, Florida, February 1-4, 1998.

## Section 4 – Recycled Water Quality and Intended Uses

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### Recycled Water by Uses

This section provides supplemental technical information for each intended use of recycled water being considered in Redwood City. When properly managed and monitored, recycled water will result in a dependable and safe new water supply, and will reconcile the existing imbalance between the City's water supply and demand.

As described in Section 3, Disinfected Tertiary Recycled Water generated at SBSA is intended for use in four general regulatory non-potable categories;

1. primarily for irrigation,
2. to a much lesser extent for use in impoundments,
3. industrial and commercial cooling,
4. and other purposes as permitted under Title 22 (see Figure 2).

Title 22 regulations set forth the requirements for protection of public health for these general categories where recycled water is typically suitable to the end user or customer. In order to determine if the recycled water quality produced at SBSA is suitable for Redwood City's customers, the City performed research and water quality evaluations in connection with SBSA's three-year pilot project.

In 2001 and 2002, landscapes throughout the entire Redwood Shores were screened and reviewed by landscape and irrigation specialists with significant experience in using recycled water for urban landscape irrigation in the Bay Area. Several representative landscapes were selected that reflect the broad spectrum of development style, planting types, irrigation systems and soil variations in Redwood Shores for detailed evaluation as part of the *Water Recycling Feasibility Study for the Redwood Shores Area* (Kennedy/Jenks Consultants, January 2002). A total of three homeowners associations, a school and community center, a park, a sports complex, two street landscapes and two commercial property sites were included. A series of site visits were made to review plant types, irrigation systems and observe landscape management practices. Interviews with current landscape maintenance personnel were conducted along with review of several years of irrigation records and climatological data. This evaluation concluded that all of the representative landscapes were appropriate for irrigation with recycled water, but that current water management practices would need to be improved throughout Redwood Shores to reduce chronic and widespread over watering and site runoff. A number of water management recommendations were provided in the final report, and ongoing reviews of the sites being irrigated since the spring of 2000 confirm that the first three years of irrigation with recycled water has been successful, as noted on page 3 of the IS/MND.

Following receipt of additional public concerns and comments related to water quality after the study was performed, the City requested that a number of additional water quality evaluations be performed. This recent work is summarized in this section including:

- Review of SBSA water quality data against industry standards and other accepted guidelines for specific uses in greater detail;
- Comparison of SBSA's recycled water quality to the water quality in other recycled water projects that have been in operation for relatively long periods of time, and have a very similar project setting as Redwood City;
- Development of concepts for management strategies to assure reliable service is provided to the customer.

As a result of the recent investigations, three proposed uses (irrigation, cooling and concrete mixing) were reviewed in greater detail, as they represent about 90% of the potential use of recycled water in Redwood City and there were either public or City staff comments or concerns expressed relative to these uses. Other uses including construction water, toilet flushing in commercial/office buildings, and dust control were reviewed. Title 22 regulations set forth all of the requirements that are required to achieve high levels of performance and service for these uses.

The following tables summarize the key water quality parameters relative to using recycled water for landscape irrigation, industrial and commercial cooling, and concrete production. For each use, water quality parameters are identified and compared to industry standards and the test results for Redwood City's current Hetch Hetchy potable supply, and the proposed recycled water supply. Remarks are provided relative to whether these parameters might be of concern to Redwood City's customers, and if so, management methods are defined to address potential problems. Parameters are identified for further monitoring as part of the City's long-term commitment to providing safe and reliable service to its customers.

To further demonstrate the suitability of recycled water for many specific uses, the City performed a general benchmarking survey of other recycled water projects in the Bay Area as discussed in Table 1. Table 5 provides a comparison of SBSA's water quality to these same representative projects that have been successfully operated for up to 20 years.

## Summary

SBSA's recycled water quality is appropriate for the intended uses identified, and the City can serve customers with a high degree of reliability. Long-term customer acceptance will be augmented with a comprehensive customer information program, a water management guidebook of protocols and methods, and a proactive water quality monitoring program. In addition, the City will continue to offer free large landscape water management consultation services. The evidence for this conclusion includes:

- The First-Step Recycled Water Project has achieved compliance with Title 22 regulations and has been successful for irrigation uses in its first three years of operation.



- The recycled water quality provided by SBSA is within generally accepted standards and guidelines for the proposed uses.
- The City's proposed recycled water project is very similar to several other Bay Area projects that have been successfully operated for extended periods of time. These representative projects serve as examples that recycled water is a beneficial, drought-proof water resource that Redwood City residents can also enjoy. Although there are a few water quality parameters that are close to or slightly exceed generally accepted guidelines in each of these projects, management methods and customer information programs have resulted in high customer satisfaction and acceptance over time.

**Table 2 – Water Quality Matrix for Landscape Irrigation****SALINITY, PERMEABILITY, TOXICITY & NITROGEN**

PARAMETER OF POTENTIAL CONCERN			Units	Degree of Restriction of Use <sup>1</sup>			Comments (Reference Next Page)	SBSA RECYCLED WATER	HETCH HETCHY POTABLE WATER
				None	Slight to Moderate	Severe		RANGE	RANGE
SALINITY (Total Salt Content)	Electrical Conductivity (Ecw)		dS/m	<0.7	0.7 - 3.0	>3.0	See Salinity Comments next page	1.5 - 1.6	0.009 - 0.34
	Total Dissolved Solids (TDS)		mg/l	<450	450 - 2000	>2000		710 - 800	15 - 170
PERMEABILITY	Sodium Absorption Ratio (SAR) =	6 -- 12	with an Ecw =	>1.9	1.9 - 0.5	<0.5	See Permeability Comments next page	SAR = 7.2 - 7.3	NA
								Ecw = 1.53 - 1.56	NA
NITROGEN (Total N)			mg-N/l	<5	5 -- 30	>30	See Nitrogen Comments next page	~23 (ammonia + nitrite + nitrate as nitrogen)	<0.4
TOXICITY	Ion Toxicity								
	Sodium (Na) Surface Irrigation	SAR	<3	3 -- 9	>9	See Ion Toxicity Comments next page	7.23 - 7.31	NA	
		Spray Irrigation	mg/l	<70	>70		203 - 204	<3 - 9	
	Chloride (Cl) Surface Irrigation	mg/l	<140	140 - 350	>350		300	<3 - 10	
		Spray Irrigation	mg/l	<100	>100		300	<3 - 10	
	Boron (B)	mg/l	<0.7	0.7 - 3.0	>3.0		0.515		
	Trace Metal Toxicity								
	Trace Metals	Recommended Maximum Concentration (mg/l) <sup>1</sup>				See Trace Metals Toxicity Comments next page			
	Aluminum	5.0					0.00012 - 0.00013	<0.050 - 0.088	
	Copper	0.20					<0.00002	<0.001 - 0.034	
Iron	5.0				0.00009 - 0.0001		<0.1 - 0.28		
Lead	5.0				0.00048 - 0.0024		<0.002 - 0.028		

<sup>1</sup>Adapted from Ayers and Westcott & Irrigation with Reclaimed Municipal Wastewater A Guidance Manual, 1984

University of California Extension Leaflet 2995 Water Quality - Its Effects on Ornamental Plants

Data from the National Urban Agriculture Council on Marin Municipal Water District's Recycled Water Demonstration Garden 1995 - 2002.

## Table 2 – Water Quality Matrix for Landscape Irrigation (Comments)

### Salinity Comments:

**Concerns** - Salinity (salt content) is measured in terms of Ecw and/or TDS. If high levels of salt build up in surface soils, they can retard plant growth due to effects of ion toxicity and also reduced soil permeability which keeps water from percolating to the plant roots.

**Remarks** - The salinity level of SBSA recycled water could have a 'slight' degree of restriction on use. The data from the references, SBSA pilot project, and area demonstration gardens indicates that SBSA recycled water will not present a salinity problem for turf and the vast majority of ornamentals. Additional treatment for salt reduction is not required on a continuous basis; however, standby connection to potable water is available for blending or leeching salt from soils if needed in the future. A water management protocol for avoiding or replacing salt sensitive plants, at the customers' preference, is recommended.

### Permeability Comments:

**Concerns** - Soil permeability is commonly expressed in terms of SAR -- a ratio of the concentrations of sodium, calcium, and magnesium -- in conjunction with a specific salinity (Ecw) value. As SAR increases and Ecw decreases in any water source, soil permeability is impacted, which in turn causes reduction of soil aeration and water infiltration and percolation.

**Remarks** - The SAR and Ecw values indicate that SBSA recycled water could have a 'slight' degree of restriction of use. The use of SBSA recycled water will not present a significant problem associated with soil permeability. There are well-established methods for managing soil permeability that are typically performed for any landscape such as surface cultivation, sod plugging and the use of mulch to prevent soil compaction. Gypsum can also be added to the water or soil to further enhance permeability in the soil. Concepts for managing soil permeability should be included in a water management protocol for customers.

### Nitrogen Comments:

**Concerns** - Nitrogen in recycled water is beneficial in landscape management because it is a essential plant nutrient and reduces the need for fertilizer. However, excessive nitrogen concentration can increase the incidence of heat stress, particularly in hot climates during the summer when temperatures and irrigation volumes are at seasonal highs. Total Nitrogen (N) is composed of nitrate, nitrite and ammonia species. SBSA recycled water averages nitrate at 2.3 mg-N/l and ammonia at 21 mg-N/l.

**Remarks** - SBSA recycled water may have a 'slight' to moderate' degree of restriction of use in terms of its nitrogen content. The temperate climate at Redwood City helps to buffer potential heat stress as compared to the Central Valley of California where recycled water is used successfully for irrigation. It is anticipated that fertilization amounts and frequency will need to be reduced to prevent heat stress in the summer, and this should be provided as a water management protocol for customers.

**Ion Toxicity Comments:**

**Concerns** - Ion toxicity can occur when specific ions accumulate to toxic concentration levels in the leaves during transpiration or from overhead irrigation. Primary constituents of concern are sodium, chloride, and boron. Ion toxicity can cause foliar damage at leaf edges, leaf drop, and in severe cases long-term plant dieback.

**Remarks** - According to the guidelines, SBSA recycled water would have a "slight to moderate" degree of restriction of use for both spray and surface irrigation due to relatively elevated levels of sodium and chloride. Boron appears to be within the ranges where an ion toxicity problem will not occur. If sodium and chloride concentrations can be maintained close to their current levels, and proper water management practices are employed on landscape sites, ion problems can be avoided for the vast majority of plant species. It is recommended that plant lists and plant monitoring be performed for sensitive species, and that water quality monitoring of these ions be performed. Ion toxicity can be addressed by blending with potable water to reduce ion concentrations, if required.

**Trace Metals Toxicity Comments:**

**Concern** - Some heavy metals accumulate in the environment and are toxic to plants and animals. Aluminum can cause nonproductivity in acid soils, but soils at pH 5.5 to 8.0 will precipitate the ion and eliminate toxicity; copper can be toxic to a number of plants at 0.1 mg/L in nutrient solution; iron can contribute to soil acidification and loss of essential phosphorous and molybdenum; and lead can inhibit plant cell growth at very high concentrations.

**Remarks** - SBSA recycled water was tested for aluminum, copper, lead, and iron. The concentrations of these metals were well below the maximum allowable concentrations and no problems related to Trace Metal Toxicity are anticipated.

**Table 3 – Water Quality Matrix for Industrial and Commercial Uses**

PARAMETER OF POTENTIAL CONCERN	MAKE-UP for RECIRCULATION (mg/l)	ONCE-THROUGH (mg/L)	COMMENTS	SBSA RECYCLED WATER	HETCH HETCHY POTABLE WATER
				RANGE	RANGE
Silica (SiO <sub>2</sub> )	50	50	Can produce difficult-to-remove scale deposits.	NA	NA
			Pretreatment or sidestream filtration is often required if the silica levels are above 150 mg/l (as SiO <sub>2</sub> ). Need to analyze for silica -- typically expected to be below the limit.		
Aluminum	0.1		Aluminum concentration of SBSA recycled water is well below the allowable limit.	0.00012 - 0.00013	<0.050 - 0.088
Iron (Fe)	0.5		May be a concern if it combines with phosphate to form undesirable foulants. It may also deactivate specialized polymers used to inhibit calcium phosphate scaling.	0.00009 - 0.0001	<0.1 - 0.28
			Iron concentration of SBSA recycled water is well below the allowable limit.		
Calcium (Ca)	50	200	Calcium concentration of SBSA recycled water is below the allowable limit.	28 - 38	4 -- 29
Magnesium (Mg)	0.5		Magnesium is usually not much of a problem unless the silica levels are high. This could result in magnesium silicate scale in the heat exchangers. SBSA silica levels are not anticipated to be high as described above, but should be confirmed. Mg concentration of SBSA recycled water is 30 mg/l (annual average) and this water is being used successfully for many cooling applications.	24	<0.5 - 10
Ammonia (NH <sub>4</sub> as N)	1.0		An macro nutrient for microorganisms, it can promote biofilm development and growth in the heat exchangers and cooling tower fill. It is also extremely corrosive to copper alloys (even those well passivated with chemicals.) There have been documented cases of stress corrosion cracking in copper alloys from ammonia concentrations as low as 2.0 ppm.	21	NA
			Biological growth is typically controlled by the addition of biocides. It should be recommended that a cooling tower system with copper alloys not use SBSA recycled water.		
Sulfate (SO <sub>4</sub> )	200	680	Sulfate concentration of SBSA recycled water is below the allowable limit.	76 - 80	<1 - 23
Chloride (Cl)	500	600	Can be corrosive to most metals, especially mild steel. A chloride limit of 300 ppm is often used for stainless steel, but limits for other metals may go as high as 1,000 ppm.	300	<3 - 10
			Chloride concentration of SBSA recycled water is below the allowable limit.		
Total Dissolved Solids (TDS)	500	1,000	Excessive concentrations can cause scaling on the cooling surfaces, reducing the efficiency of heat exchange units.	710 - 880	15 - 170
			Varying the blowdown rate controls the degree of concentration of dissolved constituents in the cooling tower.		
Zinc (Zn)	0.5 - 3.0		Can assist phosphates and nitrates in reducing mild steel corrosion rates and pitting tendencies. Levels in cooling water above 0.5 mg/l are beneficial, but levels above 3.0 mg/l can contribute to deposits.	NA	NA
			Need to analyze for Zn. Expected to be well below the limit. The annual average of Zn for South Bay recycled water is 0.0055 mg/l.		
Hardness	650	850	Calcium is particularly troublesome because certain calcium salts exhibit an inverse solubility in water with regards to temperature. Unlike most salts in solution, which become more soluble with increasing temperature, calcium carbonate becomes less soluble with increasing temperature.	NA	NA
			Need to analyze for hardness. Expected to be below the limit. The annual average hardness for South Bay recycled water is 238 mg/l.		
Alkalinity	350	500.0	Bicarbonates normally represent the major portion of the measured alkalinity, although under certain conditions, appreciable amounts of carbonate and hydroxide alkalinity may also be present. Alkalinity is an important means of predicting calcium carbonate scale potential.	NA	14 - 110
			Bicarbonate of SBSA recycled water is 268 - 303 mg/l, and can be assumed that this constitutes the vast majority of alkalinity. Therefore, alkalinity appears to be below limit; and coupled with low calcium concentration, should not present any problem.		
pH	6.9 - 9.0	5.0 - 8.3	pH of SBSA recycled water is within the acceptable range.	8.1 - 8.2	8.6 - 9.6
BOD	25		Reflects the organic content for biological organisms and the associated demand for oxidizing biocide in addition to the amount used for bio fouling control.	10	NA
			Will not be an issue for SBSA recycled water which is well below 25 mg/l BOD.		
TSS	100	1000	Unlike dissolved solids, not all suspended solids enter the cooling system with the makeup water. Some might be generated as corrosion and scale byproducts or from air/water contact. Suspended solids can adhere to biofilms and cause under-deposit corrosion.	NA	NA
			TSS can be controlled through pretreatment, sidestream filtration or through use of deposit control agents. Need to analyze for TSS, but should be below the limit. TSS of South Bay recycled water is 2.0 mg/l.		

**Sources:**

Adapted from National Academy of Science, National Academy of Engineering: Water Quality Criteria (1972)

Adapted from Water Pollution Control Foundation and Goldstein et al

**NA = Not Analyzed**

Shaded area indicates no applicable data/information is provided.

**Table 4 – Water Quality Matrix for Concrete Mixing Water**

PARAMETER OF POTENTIAL CONCERN	SUMMARY	HETCH HETCHY POTABLE WATER	SBSA RECYCLED WATER*		AMERICAN CONCRETE INSTITUTE (ASTM C94)**	CALTRANS STANDARD SPECIFICATIONS (JULY 1995)	BS 3148 (BRITISH STANDARDS)	PORTLAND CEMENT ASSOCIATION (1, 13, 17)	TOLERABLE LIMIT FOR CONCRETE STRENGTH (9, 18)
		RANGE	RANGE	AVERAGE	LIMITS	LIMITS	LIMITS	LIMITS	LIMITS
Chloride	Reduction in strength, using sodium chloride solutions. Surface efflorescence and persistent dampness. Possible adverse effect of chloride ions on the corrosion of reinforcing steel or prestressing strands; calcium chloride admixtures should be avoided in steel-reinforced concrete.	<3 - 19	300	300	500	1000 (conventionally reinforced)	500		500
	Chloride concentration of SBSA recycled water is below various limits.					650 (prestressed)			
					1000	2000 (non-reinforced)			
Sulfate	Delayed reduction of compressive strength; may increase early strength but reduce later strength. Possible expansive reactions and deterioration.	<0.5 - 30	76 - 80	78	3000	1300 (reinforced & prestressed)	1000		1000
	Sulfate concentration of SBSA recycled water is below various limits.					1500 (non-reinforced)			
Alkalies as (Na <sub>2</sub> O + 0.658 K <sub>2</sub> O)	Alkali-Aggregate Reaction with Silica -- cracking and disruptive expansion. Should be analyzed prior to final evaluation for use.				600	300			
Magnesium	Alkali-Aggregate Reaction (Silica) and Alkali-Carbonate Reaction -- cracking and disruptive expansion. Magnesium sulfate should be less than 25,000 ppm.	<0.5 - 9	24	24			Combined total <2000		
Calcium		4 -- 27	28 - 38	33					
Potassium		<0.5 - 1	14	14					
Sodium	All below various limits.	3 -- 22	203 - 204	203.5					
Total Alkalinity (as CaCO <sub>3</sub> )	Up to 2000 mg/l of sodium carbonate or bicarbonate or the sum is tolerable -- causing reduction in mortar strengths in excessive amount.	11 - 122	NT	NT					1000
Carbonate	Performance tests recommended for water with no service record contains alkali carbonate or bicarbonate in excess of 1000 mg/L.								1000
Bicarbonate	Below the limits.	NA	268 - 303	285.5					400
pH	Acidic waters cause corrosion; alkaline waters (sodium or potassium hydroxide) can cause quick setting and low strengths.	7.4 - 9.8	8.1 - 8.2	8.15					3.0
	Within the acceptable range.								
Total Dissolved Solids (TDS)	Performance tests are recommended when water for which no service record is available contains TDS more than 2000 mg/l.	21 - 170	700 - 800	740			2000		4000
	Below the limits								
Suspended Solids	May increase water demand, increase drying shrinkage, or cause efflorescence; retard the setting and hardening of concrete.						2000	1000	2000
(Inorganic + organic + algae)	Algae or other suspended organic materials may retard setting and strength development by interfering with cement hydration; entrain excessive amounts of air, thereby reducing strength.								
Turbidity	Below the limits.	0.18 - 0.64							
Miscellaneous Inorganic Salts	Iodates, Phosphates, Arsenates, Borates							500 each	
	Boron	NA	0.5 - 0.53	0.515				500	
	Copper	<2 - 130	<0.02	<0.02				500	500
	Lead	<2 - 17	NT	NT				500	500
	Manganese							500	
	Tin							500	
	Zinc							500	500

NA Not available

NT Not tested

NR Not reported

NS Not sampled

\*SBSA recycled water meets or exceeds all Title 22 requirements for tertiary treated recycled

\*\*Applicable when wash water from mixer washout

**Table 5 – Recycled Water Quality Comparison of Bay Area Projects**

<b>WATER QUALITY PARAMETERS</b>	<b>UNIT</b>	<b>SBSA Recycled Water</b>	<b>South Bay Water Recycling <sup>1</sup></b>	<b>Marin Municipal Water District<sup>2</sup></b>	<b>City of Sunnyvale<sup>3</sup></b>	<b>City of Palo Alto<sup>4</sup></b>
<b>GENERAL</b>						
<b>Alkalinity (Total as CaCO<sub>3</sub>)</b>	mg/L	NS	183	90.3	139	NA
<b>Bicarbonate (HCO<sub>3</sub>)</b>	mg/L	268 - 303	183	90.3	139	NA
<b>BOD (Biological Oxygen Demand)</b>	mg/L	6.0 <sup>5</sup>	<3.4	NA	NA	1.6
<b>Conductivity (Ecw)</b>	dS/m	1.5 - 1.6	1.2	0.95	1.28	NA
<b>Hardness (Total as CaCO<sub>3</sub>)</b>	mg/L	NS	238	187.5	294	NA
<b>pH</b>	pH unit	8.1 - 8.2	6.9	7.4	7.1	NA
<b>TDS</b>	mg/L	710 - 800	724	571	778	NA
<b>TSS</b>	mg/L	NA	2	NA	NA	1.9
<b>Turbidity</b>	NTU	0.2 - 1.9	0.8	1.3	NA	1
<b>SAR (not adjusted)</b>	calculated	NA	4.3	NA	3.29 - 4.15	NA
<b>SAR (adjusted)</b>	calculated	7.2 - 7.3	NA	3.1 - 4.2	3.25 - 4.19	NA
<b>INORGANIC CHEMICALS</b>						
<b>Aluminum</b>	ug/L	0.12 - 0.13	NA	0.33	NA	NA
<b>Ammonia</b>	mg/L	25 - 26	<0.4	NA	1.3	0.5
<b>Arsenic</b>	ug/L	NS	1.1	ND	NA	0.9
<b>Boron</b>	mg/L	0.5 - 0.53	0.52	0.3	0.47	NA
<b>Cadmium</b>	ug/L	NS	<0.5	<1.0	NA	0.2
<b>Calcium</b>	mg/L	28 - 38	50.6	28.7	51	NA
<b>Chloride</b>	mg/L	300	190	124.2	244	NA
<b>Chromium</b>	ug/L	NS	<0.6	ND	NA	0.7
<b>Copper</b>	ug/L	<0.02	3	NA	NA	7
<b>Cyanide</b>	ug/L	NS	NA	0.2	NA	3.9
<b>Iron</b>	ug/L	0.09 - 0.1	NA	0.09	NA	NA
<b>Lead</b>	ug/L	0.48 - 2.4	<1.0	<5.0	NA	0.4
<b>Magnesium</b>	mg/L	24	29.9	21.9	41	NA
<b>Manganese</b>	ug/L	NS	NA	40	NA	NA
<b>Mercury</b>	ug/L	NS	<0.0022	NA	NA	0.007
<b>Nickel</b>	ug/L	NS	5.7	<10.0	NA	3.9
<b>Nitrate</b>	mg/L-N	2.0 - 2.5	9.8	20.9	15	18.8
<b>Nitrite</b>	mg/L-N	NS	<0.3	0.17	NA	0.044
<b>Phosphate</b>	mg/L	NS	2.8	1.4	4	11.1
<b>Potassium</b>	mg/L	14	16.3	NA	NA	NA
<b>Selenium</b>	ug/L	NS	NA	<0.005	NA	0.5
<b>Silica</b>	mg/L	NS	12	NA	NA	NA
<b>Silver</b>	ug/L	NS	<0.2	<5	NA	0.2
<b>Sodium</b>	mg/L	203 - 204	156	120.6	151	NA
<b>Sulfate</b>	mg/L	76 - 80	103	90.4	94	NA
<b>Zinc</b>	ug/L	NS	55	1660	NA	3.9

NS = Not Sampled

NA = Not Available

ND = Not Detected

## Notes:

1. 2002 yearly average data from San Jose/Santa Clara Water Pollution Control Plant
2. 1998 yearly average data from Marin Municipal Water District - Las Gallinas Valley Reclamation Plant
3. 2002 yearly average data from the Sunnyvale Water Pollution Control Plant.
4. 2002 yearly average data from the Palo Alto Regional Water Quality Control Plant.
5. Value is for Carbonaceous Biochemical Oxygen Demand (CBOD) as reported to the RWQCB in SBSA's 2002 Annual Report.

## Section 5 – Integrated Water Quality Assurance Program

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### Purpose

This section provides supplemental technical information on the regulatory requirements that will become a part of the proposed project if it is approved. If the City Council does approval the project, Redwood City will assume responsibility for the development of full and complete technical information required to obtain a permit for construction and operation of a recycled water system from the State.

Currently, the City and SBSA hold a permit for operation of the First Step Project, as reflected in the *First Step Recycled Water Project Conformed Engineer's Report Update, July 2002*, prepared for the City of Redwood City Public Works Services Department and the South Bayside System Authority, by Whitley Burchett & Associates.

### SBSA Wastewater Source Control

SBSA regulations governing discharge to sanitary sewers were developed according to federal guidelines in order to protect the sewer system and the treatment facility, and to assure compliance with SBSA's permit to discharge to San Francisco Bay. The regulations prohibit the discharge of many types of wastes to the sanitary sewers. Among discharges specifically prohibited are "toxic substances" and "hazardous waste".

The U.S. EPA requires that publicly owned treatment works such as SBSA implement a "pretreatment program" for regulating industries (refer to the Code of Federal Regulations Chapter 40 Parts 400-471). In addition to general regulations for establishing a "pretreatment program" to regulate industries, these regulations address specific categories of industries. In the SBSA service area these include: electroplating, circuit board manufacturing, metal finishing, electrical and electronic components, and pharmaceutical manufacturing. There are a total of 20 companies in the SBSA service area which fall into these categories. Results of pretreatment compliance monitoring are summarized in the Annual Pretreatment Report that is submitted to various regulatory agencies. A copy of the pretreatment annual report can be obtained from SBSA upon request.

The SBSA treatment process utilizes several biological processes that could be effected by improper discharge of wastes. The SBSA NPDES discharge permit contains many prohibitions and limitations to protect the sensitive aquatic habitat of San Francisco Bay. Through the combination of the highly effective Pretreatment Program and consistent careful treatment process operation and control SBSA has achieved an exemplary record of regulatory compliance.



## Redwood City Permit Compliance

According to the State of California Title 22 Code of Regulations, Division 4 – Environmental Health, Chapter 3, Water Recycling Criteria, Article 1: The California Regional Water Quality Control Board has jurisdiction over water recycling plants and use areas.

The California Water Code, Article 4 – Regulation, assigns the responsibility for setting water recycling criteria to the State Department of Health Services, and sets forth the protocols for DHS recommendations requirements to RWQCB. Article 4 also delineates the State Legislature’s water recycling goal, the procedure for identifying potential uses, and the application process for recycled water supply at the wholesale, retail and customer levels. Prior to commencement of construction of a recycled water project, Redwood City shall submit to DHS an Engineering Report for review and approval, such that DHS may recommend to the RWQCB that a permit be issued for the project. The report shall address all Water Code requirements including report submittal, design requirements and operation requirements. Redwood City shall ensure that design and construction documents minimally meet the State’s requirements, as well as any unique features and conditions imposed by the City Council at the time of project approval. At that juncture, SBSA (as producer/wholesaler) and Redwood City (as distributor/retailer) will be accountable for full compliance with all regulations outlined in the *California Health Laws Related to Recycled Water – The Purple Book*; excerpts from the Health and Safety Code, Water Code, and Titles 22 and 17 of the California Code of Regulations, June 2001 Edition.

All requirements for protection from cross-connections is delineated in the State of California Title 17 Code of Requirements, Division 1, Chapter 5, Article 2 – Protection of Water System, and in the California Health and Safety Code, Division 104, Part 12, Chapter 5, Article 2. Redwood City shall be responsible for continuous compliance with these regulatory requirements.

## Redwood City Program Activities and Customer Support Services

Redwood City will develop a comprehensive set of rules, regulations and guidelines for use by existing and potential recycled water customers, which in turn will be supported by City Council policy actions reflected in resolutions and/or ordinances. The guidelines will be augmented by a staffed customer information program, with the goal of ensuring that customers are able to meet all applicable regulations and use recycled water with a high degree of long-term safety and success. Fundamental elements of the guidelines will include guidance for the design and operation of customer (“on-site”) recycled water facilities – both for existing and new sites. The guidelines will include:

1. Planning for recycled water use
  - Determination to use recycled water
  - Protection of public health
  - Approved uses of recycled water
  - Recycled water use permit (required for each site)

- Local authority (responsibilities and authorities vested in the City Council)
- Procedure for obtaining service
- City-sponsored plant material replacement and irrigation equipment rebate programs
- 2. Design, installation and inspection of on-site recycled water irrigation systems
  - Design requirements at service connection
  - Design requirements for on-site facilities
  - Information required on plans
  - Installation and construction inspections
- 3. Operation and maintenance
  - General customer responsibilities
  - System operations
    - System responsibilities
      - Wholesaler (SBSA)
      - Retailer (Redwood City)
      - Customer (site owners / managers)
  - Cross connection protection

## **Water Quality Monitoring Program**

Based on the review of water quality parameters for various uses presented in Section 4, a number of non-regulatory parameters are identified as being important relative to maintaining good service to customers in Redwood City and in assisting them with effective water management. These parameters are identified in Table 6 for each use of recycled water relative to the recommended limits for each parameter. The current levels of these parameters in SBSA's recycled water are also indicated.

It is anticipated that this water quality monitoring program will evolve over time, and be responsive to new regulations and protocols. Parameters may be added or deleted, based on the City's experience and customer satisfaction. The intent is to be proactive in monitoring the parameters that might become problematic, with water management practices or protocols developed for the customer's use.

**Table 6 – Water Quality Objectives and Monitoring Program Matrix**

WATER QUALITY PARAMETERS	UNIT	RECOMMENDED LIMITS FOR RECYCLED WATER APPLICATIONS			SBSA RECYCLED WATER
		LANDSCAPE IRRIGATION	COOLING WATER (Make-up / Once-through)	CONCRETE MIXING WATER	
GENERAL					
Alkalinity (Total as CaCO <sub>3</sub> )	mg/l		350 / --	1000	NS
Bicarbonate (HCO <sub>3</sub> )	mg/l	500	24 / 600	400	268 - 303
BOD <sub>5</sub> (Biochemical Oxygen Demand)	mg/l		25 / --		6.0 <sup>1</sup>
Conductivity (Ecw)	dS/m	3			1.5 - 1.6
Hardness (Total as CaCO <sub>3</sub> )	mg/l		650 / 850		NS
pH	pH unit	6.5 - 8.4	6.9 - 9.0/5.0 - 8.3	3<	8.1 - 8.2
TDS	mg/l	1000	500 / 1000	2000	710 - 800
TSS	mg/l		100 / 1000	1000	NA
Turbidity	NTU				0.2 - 1.9
SAR (Adjusted)	calculated	6 - 12			7.23 - 7.31
INORGANIC CHEMICALS					
Alkali (as Na <sub>2</sub> O + 0.658K <sub>2</sub> O)	mg/l			300	NS
Aluminum	ug/L	5000		100	0.12 - 0.13
Ammonia	mg-N/l			1.0	21
Arsenic	ug/L	100			NS
Boron	mg/L	3		500	0.5 - 0.53
Cadmium	ug/L	10			NS
Calcium	mg/l		50 / 200	500	28 - 38
Chloride	mg/l	350	500 / 600	500	300
Copper	ug/L	200		500,000	<0.02
Iron	ug/L	5000	500 / --	500,000	0.09 - 0.1
Lead	ug/L	5000		500,000	0.48 - 2.4
Magnesium	mg/ l		0.5 / --	500	24
Manganese	ug/L	200		500,000	NS
Nitrate	mg-N/l	30 (total Nitrogen)		500	2.3
Phosphate	mg/l			500	NS
Potassium	mg/l			500	14
Silica	mg/l		50 / 50		NS
Sodium	mg/l	>70 for SAR = 3 - 9		500	203 - 204
Sulfate	mg/l		200 / 680	1000	76 - 80
Zinc	ug/L	2000	500 - 3000 / --	500,000	NS

NS = Not Sampled

NA = Not Available

Shaded area denotes no numerical limit is set.

Note 1: Value is for Carbonaceous Biochemical Oxygen Demand (CBOD) as reported to the RWQCB in SBSA's 2002 Annual Report.

## Contingency Plan

Section 3.3 of the *First Step Recycled Water Project Conformed Engineer's Report Update, July 2002* (prepared for the City of Redwood City Public Works Services Department and the South Bayside System Authority, by Whitley Burchett & Associates) delineates the DHS-approved contingency plan in place at SBSA. The purpose of the contingency plan is to assure that water not meeting Title 22 requirements for disinfected tertiary treated recycled water is not distributed to customers. The contingency plan describes the steps that must be taken in the event that a diversion of the recycled water is necessary, the capacity of contingency storage and conditions for use, and the emergency notification procedure.

The *Final Report for the Water Recycling Feasibility Study for Redwood City* (Kennedy/Jenks Consultants, August 2002) delineates design concepts for the proposed recycled water project, including a stand-by potable connection with an air gap at the storage tanks. Should SBSA determine that a diversion of recycled water is necessary, potable water may be used in the interim to ensure that all recycled water customer needs are met until recycled water service is restored.

## Section 6 – Documents Incorporated by Reference

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1. *Initial Study/Mitigated Negative Declaration (IS/MND) for the Redwood City Recycled Water Project*, prepared for the City of Redwood City Public Works Services Department, by CH2MHILL, June 2002.
2. *First Step Recycled Water Project Conformed Engineer's Report Update, July 2002*. Prepared for the City of Redwood City Public Works Services Department and the South Bayside System Authority, by Whitley Burchett & Associates.
3. *California Health Laws Related to Recycled Water – The Purple Book*. Excerpts from the Health and Safety Code, Water Code, and Titles 22 and 17 of the California Code of Regulations. June 2001 Edition. Available at [www.dhs.ca.gov](http://www.dhs.ca.gov).

## Section 7 – List of Preparers and Contributors

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# Appendices

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**Appendix A** – Staff Report and Minutes of August 6, 2002 Planning Commission Meeting

**Appendix B** – California Municipal Wastewater Reclamation Survey, May 24, 2000, by Office of Water Recycling, California State Water Resources Control Board.

**Appendix C** – “Water Recycling in California”, A summary of the California Municipal Wastewater Reclamation Survey, May 24, 2000 (Appendix B), prepared by the Redwood City Public Works Services Department, revised April 2003.